

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE No.: 24-cv-60443-MD**

PEDRO BENAVIDES

Plaintiff,  
v.

SPRIGHTFUL SOLAR INSTALLATIONS LLC  
and PABLO CORREDOR

Defendants. /

**DEFENDANTS' UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO RESPOND TO COMPLAINT**

Defendants, SPRIGHTFUL SOLAR INSTALLATIONS LLC and PABLO CORREDOR, by and through their undersigned counsel, hereby move, on an unopposed basis, for a two week extension of time to respond to Plaintiff PEDRO BENAVIDES' Complaint, up to and including, Friday, May 17, 2024, and in support thereof states as follows:

1. On March 20, 2024, Plaintiff, PEDRO BENAVIDES, filed the operative Complaint in this action [DE 1].
2. Defendants were served with the Complaint on or about April 22, 2024. Therefore a response is due by May 3, 2024.
3. On May 1, 2024, the undersigned counsel, upon being retained by Defendant, filed a Notice of Appearance [DE 9].
4. Because the undersigned was only recently retained and needs additional time to review and investigate Plaintiff's allegations in order to respond to the Complaint, Defendants request that the Court grant Defendants a two week extension to respond to the Complaint up to including, Friday, May 17, 2024.

5. Undersigned counsel conferred with Plaintiff's counsel regarding this request for an extension and Plaintiff's counsel does not oppose this request.

6. This motion is made in good faith and not for purposes of delay. Moreover, no party will be prejudiced by the granting of this motion.

WHEREFORE, Defendants, SPRIGHTFUL SOLAR INSTALLATIONS LLC and PABLO CORREDOR, respectfully request that the Court grant their unopposed request for a two week extension of time, up to and including Friday, May 17, 2024, in which to file their response to Plaintiff PEDRO BENAVIDES' Complaint.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1.A.3**

I HEREBY CERTIFY that counsel for the movant has conferred with all parties who may be affected by the relief sought in this motion in a good faith effort to resolve the issue raised by this motion and Plaintiff is not opposed to the relief sought by this motion.

Respectfully submitted,

**GALLUP AUERBACH**  
4000 Hollywood Boulevard  
Presidential Circle-Suite 265 South  
Hollywood, Florida 33021  
Telephone: (954) 894-3035  
Facsimile: (754) 200-2836  
E-mail: [dgallup@gallup-law.com](mailto:dgallup@gallup-law.com)

By: /s/ Dana M. Gallup  
Dana M. Gallup  
Fla. Bar No.: 949329  
*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 3, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Dana M. Gallup  
Dana M. Gallup  
Fla. Bar No.: 949329

**SERVICE LIST**  
**Benavides v. Sprightful Solar Installations LLC et al**  
**Case #: 24-cv-60443-MD**

Briah H. Pollock, Esq.  
Fla Bar #: 174742

Fairlaw Firm  
135 San Remo Avenue  
Suite 770  
Coral Gables, FL 33146

Tel: 305-230-4884

Email: [brian@fairlawattorney.com](mailto:brian@fairlawattorney.com)

*Via CM-ECF*